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Of Counsel:  
NICHOLAS A. TRUTANICH  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANDRA J. DE FORREST  
f/k/a SANDRA J. CONROW,

Defendant.

Case No. 2:17-cv-3048-GWN-DJA

**STIPULATION AND ORDER FOR  
AN EXTENSION OF TIME TO  
REPLY TO DEFENDANT'S  
RESPONSE TO UNITED STATES'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

**(First Request)**

In accordance with the U.S. District of Nevada, Local Rule IA 6-1, the United States of America and Defendant Sandra De Forrest ("the parties"), by and through their undersigned counsel, hereby submit this Stipulation and Order for an Extension of Time to Reply to Defendant's Response to United States' Motion for Partial Summary Judgment from August 9, 2019 until August 30, 2019. This is the first stipulation for such an extension. For the reasons set forth below, the parties submit that good cause exists for such an extension.

1           1.       On February 19, 2019, this Court set a dispositive motion deadline in this case of  
2 May 7, 2019. Dkt. # 25. The United States filed a Motion for Partial Summary Judgment on  
3 May 6, 2019. Dkt. # 26. Under this Court's Local Rules, the Defendant was required to respond  
4 to the motion no later than May 27, 2019. LR 7.2.

5           2.       On May 13, 2019, the Court approved a stipulation of the parties extending  
6 Defendant's response date until July 26, 2019. Dkt. # 30. This stipulation was based on the  
7 complex nature of the case and other commitments of counsel.

8           3.       Defendant filed her response to the United States' motion on July 26, 2019. Dkt.  
9 # 34. Under this Court's Local Rules, a reply to that response is due on August 9, 2019. LR 7.2.

10          4.       As noted in the parties' earlier stipulation, this case involves complex issues.  
11 Defendant's response asserts numerous legal and factual disputes exist that would prevent the  
12 entry of summary judgment. The parties have mutually agreed that it is reasonable and  
13 appropriate to extend the date to file a reply to this response.

14          5.       The proposed extension will not impact any other deadline in this case. The  
15 parties are currently scheduled for a settlement conference on September 13, 2019. Dkt # 33.  
16 The parties are required to file a joint pretrial order on June 7, 2020. Dkt. # 25. Neither deadline  
17 will be impacted by the proposed extension. Therefore, this requested extension will not  
18 prejudice the timely, orderly, efficient resolution of this case.

19               WHEREFORE, the parties hereby stipulate and agree to this extension of time for the  
20 United States to reply to Defendant's Response to United States' Motion for Partial Summary  
21 Judgment, and respectfully request that this Court approve this stipulation and extend the United  
22 States' time to reply to said response from August 9, 2019 to August 30, 2019.

23               IT IS SO STIPULATED.  
24

1 Dated: August 7, 2019.

2 Respectfully submitted,

3 RICHARD E. ZUCKERMAN  
4 Principal Deputy Assistant Attorney General

5 /s/Rick Watson  
6 RICK WATSON  
7 Trial Attorney, Tax Division  
8 U.S. Department of Justice

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*Attorneys for Sandra J. de Forrest*

20 IT IS SO ORDERED:

21 DATED this 11 day of August, 2019.

22   
23 Gloria M. Navarro, Chief Judge  
24 UNITED STATES DISTRICT COURT